

# **EXHIBIT H**

Vladimir Iakovlev, M.D.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

IN RE: BOSTON SCIENTIFIC CORP., MDL NO.: 2326  
PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

Chapa v. Boston Scientific Corporation	2:13-cv-17511
Fisher v. Boston Scientific Corporation	2:13-cv-29324
Flandro v. Boston Scientific Corporation	2:13-cv-17027

Toronto, Ontario, Canada

Wednesday, December 17, 2014

VOLUME I

Videotaped Deposition of VLADIMIR IAKOVLEV,  
M.D., a witness herein, called for examination  
by counsel for the Defendants in the above-mentioned  
matter, the witness having been affirmed, taken at the  
offices of Neesons Reporting, 141 Adelaide Street West,  
Toronto, Ontario, at 9:11 a.m., on Wednesday, December 17,  
2014, and the proceedings being taken down by Stenotype  
and transcribed by JUDITH M. CAPUTO, RPR, CSR, CRR.

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1 findings on degradation of -- degradation bark  
2 under polarized light in microscopic observation?

3 MR. ORENT: Objection.

4 THE WITNESS: I'm the first one who is  
5 describing light microscopy features of  
6 polypropylene degradation. So that would be a full  
7 definition. To my knowledge, I am the first one.

8 BY MS. BYARD:

9 Q. To your knowledge, nobody else has  
10 done it besides you up until this point?

11 A. Nobody published.

12 Q. You continue:

13 "From mesh exposure an  
14 important finding was that sling  
15 edges rotated or curled towards the  
16 surface at the exposure sites."

17 Tell me what you meant by that.

18 THE WITNESS: Sometimes when a reason  
19 for excision is mesh exposure, the mesh, if you can  
20 see the mesh is rotated -- if this is the mucosal  
21 surface, I can see it's rotated. I can see the  
22 curl. If it is a big enough piece and well  
23 oriented then I can see it.

24 BY MS. BYARD:

25 Q. Based on your observations to

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1 BY MS. BYARD:

2 Q. Can you point me to an article  
3 that talks about identifying degradation of  
4 polypropylene sutures through the use of polarized  
5 light?

6 A. I'd have to search for it, but as  
7 I said, I mean, generally the tool is there and for  
8 diagnostic surgical pathologists they see foreign  
9 material, they have to assess what state it is in.

10 Q. Can you name an article for me,  
11 Doctor?

12 A. I cannot do it now, but I would  
13 have to search for that, but...

14 Q. Okay, thank you.

15 Similarly, can you give me the name of  
16 an article, a peer-reviewed published article, that  
17 talks about identification of degraded polypropylene  
18 by its ability to trap histological dyes?

19 MR. ORENT: Objection.

20 THE WITNESS: That is also my  
21 description.

22 BY MS. BYARD:

23 Q. Okay. You are the only one who  
24 has reported that finding, correct?

25 MR. ORENT: Objection.

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1                   THE WITNESS: Specifically for  
2 polypropylene, yes, I'm the first one.

3                   BY MS. BYARD:

4                   Q. Let's talk a little bit about how  
5 specimens get to you from the surgical location,  
6 all right? In order to understand it and breakdown  
7 what you've said here in paragraph 6 a little bit  
8 better.

9                   You would agree with me that all the  
10 specimens that you've reviewed were excised during  
11 surgery by a physician, right?

12                  A. That's correct.

13                  Q. And apart from what's described in  
14 the operative report of the excision, you don't  
15 know beyond that, what was done to remove the mesh,  
16 correct?

17                  A. Specific details, no. The only  
18 thing I need to assess as a pathologist, is  
19 acceptable for examination and to what degree I can  
20 examine it.

21                  Q. Okay. And my question is a little  
22 different.

23                  My question is, beyond what's set forth  
24 in the op report describing this excision  
25 procedure, you don't know the details of what the

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1 PROVINCE OF ONTARIO )

2 TORONTO REGION )

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4

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6 I, the undersigned, declare under penalty  
7 of perjury that I have read the foregoing transcript,  
8 and I have made any corrections, additions or  
9 deletions that I was desirous of making;

10 That the foregoing is a true and  
11 correct transcript of my testimony contained  
12 therein.

13

14

15 VLADIMIR IAKOVLEV, M.D.

16

17

18 Subscribed and sworn to before me this \_\_\_\_\_

19 Day of \_\_\_\_\_, 2014 at

20 \_\_\_\_\_, \_\_\_\_\_.

21 (City) (Province)

22

23 \_\_\_\_\_

24 (Notary Public)

25 My Commission Expires: \_\_\_\_\_